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# Guiding Principles Activity Group

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Update for the NDWAC CCL Work Group  
Plenary Meeting  
December 16-17, 2002

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# Work Group Member Participants

- Benson Kirkman
- Brian Ramaley
- Ken Merry
- Wendy Heiger-Bernays
- Others
  - EPA: Ann Codrington, Karen Wirth

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# Activity Group Task

Develop draft principles that the CCL process needs to meet

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# Draft Principles for Review by CCL Process Work Group

- Public health is the first and foremost consideration. Development and maintenance of the CCL should, to the extent possible, maximize improvements to public health.
- The classification approach should err on the side of protecting public health.
  - Inclusive rather than exclusive
  - Fully protective to sensitive subpopulations

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# Draft Principles for Review by CCL Process Work Group (cont.)

- The classification approach should be systematic and scientifically sound and should maximize transparency and reproducibility, while acknowledging that some policy judgment also will be necessary.
- The classification approach should include expert judgment.

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# Draft Principles for Review by CCL Process Work Group (cont.)

- The classification approach should provide rationale for why a contaminant is on or off list and should explain whether the decision was based on expert judgment, science, policy considerations, or other considerations.
- The classification approach should apply equal rigor to chemical and microbial contaminants from a public health perspective.

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# Draft Principles for Review by CCL Process Work Group (cont.)

*Proposed principle not reviewed by the Guiding Principles Activity Group:*

- The CCL decision-making process must be open, accessible, and understandable to all stakeholders, including the interested and informed general public as well as the professional and scientific community and all directly affected parties. To help ensure transparency and confidence in the process, key criteria, data, and assumptions used to determine inclusion or exclusion must be clearly identified and clearly justified so that any informed participant can understand and accept the rationale.

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# Draft Principles for Review by CCL Process Work Group (cont.)

*Proposed principle not reviewed by the Guiding Principles Activity Group:*

- The opportunity for substantive public involvement throughout the entire process is essential to the credibility of all decisions. There must be sufficiently broad participation that is representative of the range of affected and interested parties, thereby incorporating public values, viewpoints, and principles into the process. Affected and interested parties should be actively recruited and provided access to appropriate resources necessary to participate fully in the process in a time frame sufficient to ensure responsible participation at any stage of the process.

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# Draft Principles for Review by CCL Process Work Group (cont.)

*Proposed principle submitted December 11 by Ed Thomas, not yet discussed by the Guiding Principles Activity Group :*

- The individual and cumulative impacts of conservative science policy assumptions on the estimated risk and benefit outcomes must be transparent to analysts, decision makers, and stakeholders. When developing risk and benefit estimates, EPA should practice full disclosure and provide complete transparency by listing all the precautionary assumptions embedded in a risk reduction benefits assessment.

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# Next Steps

CCL Process Work Group plenary  
review of draft principles